

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Jamilla Clark and Arwa Aziz on Behalf of Themselves and
Others Similarly Situated, and Turning Point for Women
and Families;

-against-

The City Of New York,

Plaintiffs,

Defendant.

**REPLY DECLARATION OF
SUZANNA PUBLICKER
METTHAM**

18 Civ. 2334 (RWS)(KHP)

SUZANNA PUBLICKER METTHAM, an attorney duly admitted to practice in the
Courts of New York, declares, under penalty of perjury and pursuant to 28 U.S.C. § 1746, that
the following statements are true:

I am a Senior Counsel in the Office of Zachary W. Carter, Corporation Counsel of the
City of New York, and attorney for Defendant City of New York. As such, I am familiar with
the facts and circumstances stated herein and submit this declaration to place the relevant
documents on the record in support of Defendant's Reply Motion to Dismiss the Complaint
pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. In further
support of its motion, Defendant submits the exhibits described below.

1. Annexed as Exhibit "D" is a true and accurate copy of the plaintiff Jamilla Clark
A/K/A Jamilla Almari's Certificate of Disposition for Docket Number 2017NY003834. This
document indicates that for Ms. Clark's arrest on January 9, 2017, which forms the basis of this
lawsuit, the charges were dismissed and sealed pursuant to Section 160.55 of the N.Y. Criminal
Procedure Law on November 17, 2017.

2. Annexed as Exhibit "E" is a true and accurate copy of the plaintiff Arwa Aziz's Certificate of Disposition for Docket Number 2017KN048637. This document indicates that for Ms. Aziz's arrest on August 30, 2017, which forms the basis of this lawsuit, the charges were dismissed and sealed pursuant to Section 160.50 of the N.Y. Criminal Procedure Law on February 26, 2018.

Dated: New York, New York
August 10, 2018

ZACHARY W. CARTER
Corporation Counsel of the City of New York
Attorney for Defendant
100 Church Street, Rm. 3-212
New York, New York 10007
(212) 356-2356

By:



Suzanna Publicker Mettham
Senior Counsel

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**DECLARATION OF SUZANNA PUBLICKER
METTHAM IN FURTHER SUPPORT OF
DEFENDANT'S REPLY MOTION TO
DISMISS THE COMPLAINT AND
SUPPORTING EXHIBITS**

ZACHARY W. CARTER

*Corporation Counsel of the City of New York
Attorney for Defendant
100 Church Street, Rm. 3-212
New York, N.Y. 10007*

*Of Counsel: Suzanna Publicker Mettham
Tel: (212) 356-2356*

Due and timely service is hereby admitted.

New York, N.Y., 2018

..... Esq.

Attorney for